



September 8, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington DC 20554

Re: Comment on Rate-of-Return Study Areas with Potentially 100 Percent Overlapped by
Unsubsidized Competitors

Dear Ms. Dortch,

On August 11, 2017, the Federal Communications Commission (Commission) released a Public Notice in which the Wireline Competition Bureau (Bureau) published a list of study areas potentially subject to the 100 percent overlap rule. The Commission seeks comment on whether the competitors in the study area codes (SACs) listed are offering voice and broadband to 100 percent of locations in the relevant census blocks meeting the requirements in 47 CFR § 54.319(a). The Commission has defined an unsubsidized competitor as “a facilities-based provider of residential fixed voice and broadband service that does not receive high-cost support.”

Using Form 477 data from June 30, 2016, the Commission identified 13 rate-of-return study areas listed as potentially 100% overlapped by an unsubsidized competitor or combination of unsubsidized competitors. In the list, the Bureau listed Bascom Mutual Telephone Company (Bascom), SAC 300589 as one such area and identified WATCH TV and Time Warner Cable, Inc, now operating as Spectrum (TWC) as competitive providers. Based upon the evidence attached, we declare that our study area is not 100% overlapped by unsubsidized competitors.

On August 24, 2017, WATCH TV filed a letter with the Commission to inform the Wireline Competition Bureau, that it is unable to serve all subscribers in Bascom’s SAC given its technology, terrestrial fixed wireless, has line-of-site limitations. These line of site limitations occur throughout Bascom’s study area, including in areas served and not served by the other competitive provider listed in the August 11, 2017 Public Notice, TWC. WATCH TV therefore refuted the results of the Commission’s preliminary analysis.

TWC also does not serve Bascom's entire study area. This fact is clearly demonstrated by the FCC's online map posted at <https://fcc.gov/maps/100-pct-overlap-2017>. The map demonstrates that TWC does not serve the rural areas of Bascom's study area.

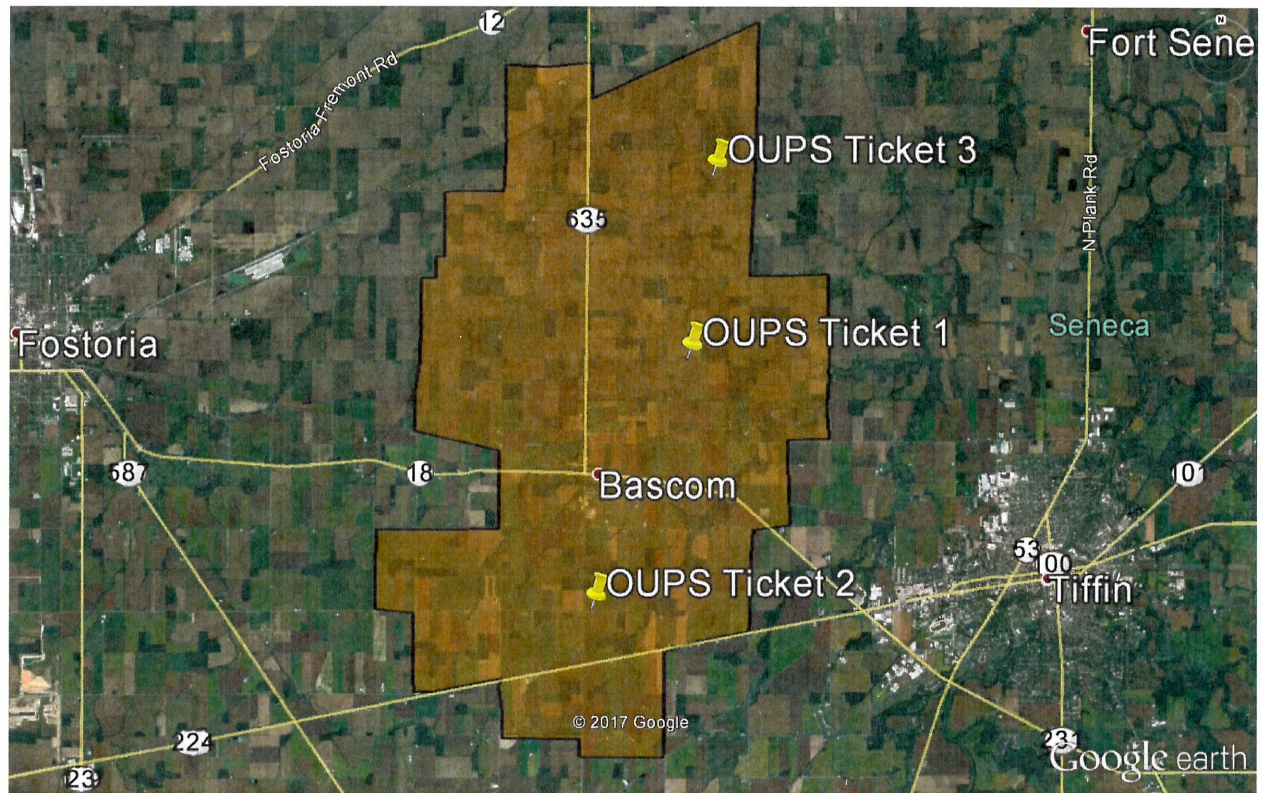
In addition, to demonstrate this fact, we have attached information from the Ohio Utilities Protection Service (OUPS). Each utility that owns or operates any underground utility facilities participates in and registers the location of its underground facilities with OUPS that serves the area where the facilities are located. OUPS publicizes the importance of ascertaining the location of underground utility facilities before excavating and the use of OUPS to ascertain that information. All facilities are documented and are updated regularly if changes are made. Based upon the data from OUPS, we are able to determine where utilities, including TWC, has facilities. Based upon the information attached, there are locations within the Bascom study area where TWC has no facilities listed. For purposes of comparison, we have also attached areas where TWC does have facilities. This additional information further demonstrates that TWC does not serve the rural areas of the Bascom study area. In addition, WATCH TV is unable to serve all subscribers in these unserved by TWC areas based upon the line of site issues discussed in its attached letter.

Based upon the information provided, Bascom refutes the Bureau's preliminary finding of 100% competitive overlap in the Bascom study area.

Sincerely,



Nathan Brickner
General Manager
Bascom Mutual Telephone Company



Newtin - A (OUPS Youngstown)

MBRCOD 00000 OUPSa 08/24/2017 12:02PM A723602088-00A ROUT NEW POLY LREQ

Ticket : A723602088 Rev: 00A Taken: 08/24/2017 12:02PM Chan: WEB
Old Tkt: A723602088 Taken: 08/24/2017 11:56AM

State: OH Cnty: SENECA Place: HOPEWELL TWP

Address : 4849 - 4849 Street: W TWP RD 132

Cross 1 : N TWP RD 109

Intersection: N

Cross 2 : N TWP RD 69

Between: N

Rail/Hwy: Milemarker(s):

Where : ENTIRE PROPERTY

WorkType: BURY POWER LINES FOR LIGHTS AT END OF EACH DRIVEWAY

Done for: OWNER

Done by : SELF

Whitelined: N Blasting: N

Means of Excavation: BACKHOE

Work date: 08/28/2017 12:11PM Meet: N

Start by : 09/08/2017 12:11PM Response Due: 08/28/2017 12:11PM

Best Fit: 41.153103/-83.255927 41.152005/-83.255914
: 41.152974/-83.266733 41.151876/-83.26672

Caller : RYAN DIBLE

Phone:

Ext:

Company : BASCOM MUTUAL TELEPHONE CO

Type: MEMB

Co addr : PO BOX 316

City : BASCOM

State: OH Zip: 44809

Email: RYAN.DIBLE@BASCOMTELEPHONE.COM

Grids : 4109000831500 4109000831530 4109000831600

Polygon : 41.153094/-83.256658 41.153085/-83.256516
 : 41.153056/-83.256380 41.153006/-83.256253
 : 41.152939/-83.256141 41.152857/-83.256049
 : 41.152763/-83.255980 41.152661/-83.255937
 : 41.152554/-83.255921 41.152446/-83.255932
 : 41.152343/-83.255972 41.152247/-83.256037
 : 41.152163/-83.256125 41.152093/-83.256234
 : 41.152041/-83.256359 41.152008/-83.256494
 : 41.151996/-83.256636 41.151885/-83.265989
 : 41.151894/-83.266130 41.151923/-83.266267
 : 41.151973/-83.266394 41.152040/-83.266506
 : 41.152122/-83.266598 41.152216/-83.266667
 : 41.152318/-83.266710 41.152425/-83.266726
 : 41.152533/-83.266715 41.152636/-83.266676
 : 41.152732/-83.266610 41.152816/-83.266522
 : 41.152886/-83.266413 41.152938/-83.266289
 : 41.152971/-83.266153 41.152983/-83.266011
 : 41.153094/-83.256658

Study Area
with no Spectrum
facilities

Members:

BAS =BASCOM MUTUAL TELEPHONE GAC =ASPIRE ENERGY (FORMERL
 NCN =NORTH CENTRL ELECTRIC

Member	Id	D	S	ADD										REMOVE									
				C	P	G	S	O	Y	C	P	G	S	O	Y	C	I						
BAS	98	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N				
EMLCFM	5	Y	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N				
GAC	517	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N				
NCN	833	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N				
TST0	1248	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	Y				
COT	285	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	Y				

Members	Delivered	Seq#	Type
BAS	08/24/2017 12:03PM	00003	MAIL
EMLCFM	08/24/2017 12:03PM	01780	SYSQ
GAC	08/24/2017 12:03PM	00061	MAIL
NCN	08/24/2017 12:03PM	00008	MAIL

Newtin - A (OUPS Youngstown)

MBRCOD 00000 OUPSa 08/24/2017 03:43PM A723603391-00A ROUT NEW POLY LREQ

Ticket : A723603391 Rev: 00A Taken: 08/24/2017 03:43PM Chan: WEB
Old Tkt: A723603391 Taken: 08/24/2017 03:40PM

State: OH Cnty: SENECA Place: HOPEWELL TWP

Address : 5903 - 5903 Street: W TWP RD 110

Cross 1 : S CTY RD 7

Intersection: N

Rail/Hwy: Milemarker(s):

Where : ENTIRE PROPERTY

WorkType: BURY ELECTRIC FOR FOUNTAIN

Done for: OWNER

Done by : SELF

Whitelined: N Blasting: N

Means of Excavation: BACKHOE

Work date: 08/28/2017 03:55PM Meet: N

Start by : 09/08/2017 03:55PM Response Due: 08/28/2017 03:55PM

Best Fit: 41.109305/-83.268005 41.108185/-83.268013
: 41.109448/-83.28627 41.108327/-83.286278

Caller : RYAN DIBLE

Phone:

Ext:

Company : BASCOM MUTUAL TELEPHONE CO

Type: MEMB

Co addr : PO BOX 316

City : BASCOM

State: OH Zip: 44809

Email: RYAN.DIBLE@BASCOMTELEPHONE.COM

Grids : 4106000831600 4106000831630 4106000831700 4106300831600 4106300831630
4106300831700

Polygon : 41.109347/-83.276193 41.109311/-83.268730
 : 41.109300/-83.268589 41.109268/-83.268453
 : 41.109217/-83.268328 41.109148/-83.268218
 : 41.109064/-83.268129 41.108969/-83.268062
 : 41.108866/-83.268022 41.108758/-83.268009
 : 41.108651/-83.268024 41.108549/-83.268066
 : 41.108454/-83.268134 41.108371/-83.268225
 : 41.108303/-83.268336 41.108253/-83.268461
 : 41.108223/-83.268598 41.108213/-83.268740
 : 41.108249/-83.276210 41.108344/-83.285558
 : 41.108356/-83.285699 41.108389/-83.285835
 : 41.108441/-83.285959 41.108510/-83.286068
 : 41.108594/-83.286157 41.108690/-83.286222
 : 41.108793/-83.286262 41.108900/-83.286274
 : 41.109007/-83.286258 41.109110/-83.286215
 : 41.109204/-83.286146 41.109286/-83.286054
 : 41.109354/-83.285943 41.109403/-83.285817
 : 41.109433/-83.285680 41.109442/-83.285538
 : 41.109347/-83.276193

Study Area
with no Spectrum
facilities

Members:

BAS =BASCOM MUTUAL TELEPHON NCN =NORTH CENTRL ELECTRIC
 OPR =AEP OHIO POWER

Member	Id	----- ADD -----										----- REMOVE -----									
		D	S	C	P	G	S	O	Y	C	P	G	S	O	Y	C	I				
BAS	98	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N				
EMLCFM	5	Y	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N				
NCN	833	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N				
OPR	954	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N				
TST0	1248	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y				
COT	285	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y				

Members	Delivered	Seq#	Type
BAS	08/24/2017 03:43PM	00005	MAIL
EMLCFM	08/24/2017 03:43PM	02979	SYSQ
NCN	08/24/2017 03:43PM	00010	MAIL
OPR	08/24/2017 03:43PM	00393	MAIL

Newtin - A (OUPS Youngstown)

MBRCOD 00000 OUPSa 08/23/2017 11:17AM A723502031-00A ROUT NEW POLY LREQ

Ticket : A723502031 Rev: 00A Taken: 08/23/2017 11:17AM Chan: OPR
Old Tkt: A723502031 Taken: 08/23/2017 11:10AM

State: OH Cnty: SENECA Place: LIBERTY TWP

Address : 0 - 0 Street: N TWP RD 69

Cross 1 : W CTY RD 592

Intersection: N

Rail/Hwy: Milemarker(s):

Where : FRONT OF PROPERTY AT ADDRESS 4244 N TWP RD 69 GOING SOUTH FOR 400FT
FARTHEST POINT OFF ROAD: 500FT OFF WEST SIDE OF ROAD
DISTANCE FROM CROSS STREET: 900FT NORTH OF

AREA IS MARKED WHITE PAINT

WorkType: FARM TILING

Done for: SELF

Done by :

Whitelined: Y Blasting: N

Means of Excavation: TILE PLOW

Work date: 08/25/2017 11:25AM Meet: N

Start by : 09/07/2017 11:25AM Response Due: 08/25/2017 11:25AM

Best Fit: 41.189024/-83.257897 41.188875/-83.254292
: 41.180562/-83.258245 41.180414/-83.254641

Caller : JOHN KLEINFELTER

Phone: 419-937-5388 Ext:

Company :

Type: HOME

Co addr : 8900 W CTY RD 592

City : FOSTORIA

State: OH Zip: 44830

Alt tel#: 419-937-5388 Ext:

Email: ASKED

Grids : 4110300831500 4111000831500

Polygon : 41.180531/-83.257484 41.180540/-83.257631
 : 41.180572/-83.257771 41.180624/-83.257901
 : 41.180694/-83.258014 41.180781/-83.258106
 : 41.180879/-83.258173 41.180986/-83.258213
 : 41.181097/-83.258223 41.188374/-83.257923
 : 41.188479/-83.257906 41.188579/-83.257862
 : 41.188671/-83.257793 41.188751/-83.257703
 : 41.188817/-83.257594 41.188866/-83.257470
 : 41.188896/-83.257336 41.188906/-83.255041
 : 41.188896/-83.254899 41.188864/-83.254762
 : 41.188814/-83.254637 41.188745/-83.254527
 : 41.188662/-83.254436 41.188567/-83.254369
 : 41.188464/-83.254328 41.188357/-83.254314
 : 41.188250/-83.254328 41.188147/-83.254369
 : 41.188052/-83.254436 41.187982/-83.254513
 : 41.183978/-83.254764 41.181066/-83.254916
 : 41.180960/-83.254935 41.180858/-83.254982
 : 41.180765/-83.255054 41.180685/-83.255149
 : 41.180620/-83.255262 41.180573/-83.255391
 : 41.180546/-83.255528 41.180531/-83.257484

Study Area
with no
facilities

Members:

BAS =BASCOM MUTUAL TELEPHON GAC =ASPIRE ENERGY (FORMERL

NCN =NORTH CENTRL ELECTRIC

Member	Id	D	S	C	P	G	S	O	Y	C	P	G	S	O	Y	C	I
BAS	98	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N
GAC	517	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N
NCN	833	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N
TST0	1248	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y
SWI	1152	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	Y

Members Delivered Seq# Type

Newtin - A (OUPS Youngstown)

MBRCOD 00000 OUPSa 08/23/2017 09:15AM A723501004-00A ROUT NEW POLY LREQ

Ticket : A723501004 Rev: 00A Taken: 08/23/2017 09:15AM Chan: OPR
Old Tkt: A723501004 Taken: 08/23/2017 09:10AM

State: OH Cnty: SENECA Place: TIFFIN

Address : 197 - 197 Street: WALL ST

Cross 1 : W ADAMS ST

Intersection: N

Cross 2 : MIAMI ST

Between: N

Rail/Hwy: Milemarker(s):

Where : REAR OF PROPERTY

FARTHEST POINT OFF ROAD: 800FT WEST

DISTANCE FROM CROSS STREET: SOUTH OF W ADAMS ST --NORTH OF MIAMI
ST

WorkType: INSTALL ANNODE

Done for: BUCKEYE PIPELINE

Done by :

Whitelined: Y Blasting: N

Means of Excavation: EXCAVATOR

Work date: 08/25/2017 09:25AM Meet: N

Start by : 09/07/2017 09:25AM Response Due: 08/25/2017 09:25AM

Best Fit: 41.122619/-83.186486 41.119416/-83.186329
: 41.122398/-83.190995 41.119195/-83.190838

Caller : DALLAS MULLINS

Phone:

Ext:

Company : O & M CONSTRUCTION

Type: CONT

Co addr : UNKNOWN

City : UNION CITY

State: IN Zip: 00000

Email: ASKED

Grids : 4107000831100

Polygon : 41.119723/-83.187394 41.119604/-83.187562
 : 41.119555/-83.187688 41.119524/-83.187825
 : 41.119515/-83.187967 41.119527/-83.188108
 : 41.119597/-83.188551 41.119234/-83.190049
 : 41.119230/-83.190188 41.119247/-83.190325
 : 41.119283/-83.190455 41.119338/-83.190574
 : 41.119408/-83.190677 41.119492/-83.190761
 : 41.119587/-83.190822 41.119688/-83.190857
 : 41.119793/-83.190867 41.121917/-83.190792
 : 41.122018/-83.190776 41.122115/-83.190736
 : 41.122204/-83.190672 41.122283/-83.190589
 : 41.122350/-83.190487 41.122435/-83.190245
 : 41.122510/-83.188707 41.122456/-83.188465
 : 41.122303/-83.188171 41.121797/-83.186813
 : 41.121739/-83.186694 41.121664/-83.186592
 : 41.121575/-83.186511 41.121476/-83.186454
 : 41.121371/-83.186424 41.121263/-83.186422
 : 41.121157/-83.186448 41.121057/-83.186501
 : 41.120072/-83.187172 41.119836/-83.187291
 : 41.119723/-83.187394

Example that
Spectrum facilities
do come up

Members:

BAS =BASCOM MUTUAL TELEPHON BUCP =BUCKEYE PIPELINE
 CGV =COLUMBIA GAS OF OHIO-F INNP =INLAND CORPORATION
 MCIP =MCI OAT =AQUA OHIO - TIFFIN
 OBFP =AT&T - OHIO OPR =AEP OHIO POWER
 TIF =TIFFIN - CITY OF WCOP =CHARTER COMM (SPECTRUM)

Member	Id	D	S	C	P	G	S	O	Y	C	P	G	S	O	Y	C	I
BAS	98	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N
BPB	135	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	Y
BUCP	163	Y	Y	N	N	N	Y	N	N	N	N	N	N	N	N	N	N
CGV	229	Y	Y	N	N	Y	N	N	N	N	N	N	N	N	N	N	N
CNF	261	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	Y
INNP	2669	Y	Y	N	N	N	Y	N	N	N	N	N	N	N	N	N	N



August 24, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Comment on Rate-of-Return Study Areas Potentially 100 Percent Overlapped by
Unsubsidized Competitors, WC Docket 10-90

Dear Ms. Dortch:

On August 11, 2017, the Federal Communications Commission (Commission) released a Public Notice in which the Wireline Competition Bureau (Bureau) published a list of study areas potentially subject to the 100% overlap rule. The Commission seeks comment on whether the competitors in the study area codes (SACs) listed are offering voice and broadband to 100% of locations in the relevant census blocks meeting the requirements in 47 CFR § 54.319(a). The Commission has defined an unsubsidized competitor as “a facilities-based provider of residential fixed voice and broadband service that does not receive high-cost support.”

Using Form 477 data from June 30, 2016, the Commission identified thirteen rate-of-return study areas as potentially 100% overlapped by an unsubsidized competitor or combination of unsubsidized competitors. In the list, the Bureau listed Bascom Mutual Telephone Company (Bascom), SAC 300589, as one such area and identified WATCH TV as a competitive provider.

This letter is to inform the Bureau that WATCH TV does not offer fixed broadband and voice service in accordance with the Commission’s service obligations for universal service to all locations within the Bascom SAC referenced in the Public Notice. Although WATCH TV provides service within the Bascom SAC, it is unable to serve all subscribers in Bascom’s SAC given its technology, terrestrial fixed wireless, has line-of- site limitations. WATCH TV therefore refutes the results of the Commission’s preliminary analysis.

Sincerely,

A handwritten signature in black ink that reads "Ken Williams". The signature is written in a cursive, slightly slanted style.

Ken Williams
President and CEO
W.A.T.C.H. TV Company